CITY OF LOS ANGELES
HCM ASSESSMENT REPORT

"Does the Historic-Cultural Monument Program Pose a Serious Threat to Development?"

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TABLE 1 - CITY OF LOS ANGELES
ESTIMATE OF PROTECTED BUILDINGS

Program (Buildings Only)(a)	Entries	Contributors	Non-Contributors
National Register Districts	48	3,548	750
California State Register Districts	25	1,342	137
Los Angeles HPOZ's	37	14,920	5,288
Listed Buildings	554	759	---
Historic-Cultural Monuments	1,322	1,503	---
Adjustment for Double Counting	---	(2,116)	---
Total	---	**19,956**	**6,175**

a) Excludes designated sites and districts that do not include buildings such as landmark locations, bridges, dams, and trees. See companion report for listings of National and State districts, National and State landmarks, listed buildings, HPOZs, and HCMs.

Total Protected Buildings (a)	**26,131**
Historic Places LA, Historic Resources (b)	65,000
Total Number of Buildings (c)	806,600

a) Includes contributors and non-contributors to be conservative.
b) Based on total number of records in the HPLA database.
c) See companion report for methodology to estimate the total number of buildings in the City of Los Angeles.

KEY TAKE-AWAYS:

1. The percentage of buildings in the City of Los Angeles identified as "potentially" historic, based on Historic Places LA data and the total building estimate, is 8.1 percent.
2. The percentage of buildings in the City that are designated historic is estimated to be 2.5 to 3.2 percent dependent on the inclusion of non-contributors. The majority of historic buildings (77 percent) are protected under the HPOZ program.

TABLE 2 – CITY OF LOS ANGELES
BUILDING DEMOLITIONS (2013-2022)

Year	Demolitions Total (a)	Demolitions 1 or 2 Family	Demolitions Apartment	Demolitions Commercial	Residential DU's Lost
2013	987	774	54	159	1,192
2014	1,321	1,084	58	179	1,668
2015	1,366	1,123	94	149	1,858
2016	1,599	1,252	103	244	1,984
2017	1,749	1,396	123	230	2,498
2018	1,841	1,420	159	262	2,618
2019	1,665	1,312	112	241	2,203
2020	1,198	948	77	173	1,617
2021	1,326	1,021	77	228	1,472
2022	1,551	1,129	100	322	1,857
Total (a, b)	**14,603**	**11,459**	**957**	**2,187**	**18,967**

a) Numbers exclude all demolition permits filed for clerical corrections, residential or apartment demolition permits filed for a minor structure such as a shed or garage, and all commercial demolition permits with a reported value of less than $5,000.

b) The reported loss of residential dwelling units includes commercial mixed-use buildings.

c) Source: https://data.lacity.org/City-Infrastructure-Service-Requests/Total-Permits-Issued-LADBS-2013-2017-Demolitions/8tb2-jn5y/about_data. Note: the source provides data for the years 2013-2023.

TABLE 3 – CITY OF LOS ANGELES
BUILDING DEMOLITIONS VERSUS HCM APPLICATIONS (2013-2022)

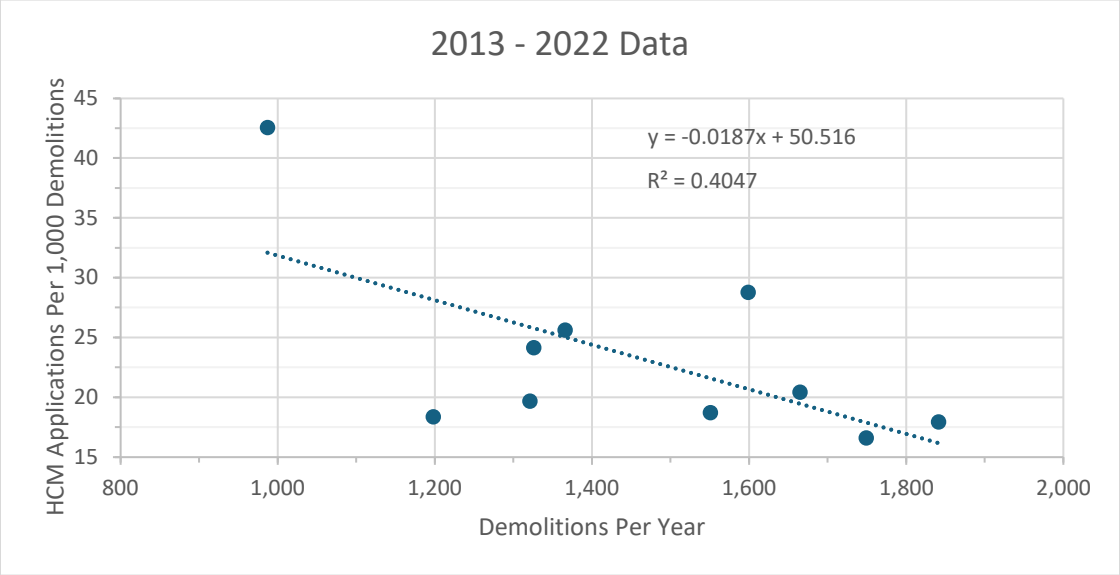
Year	Total Demolitions	HCMs Approved	HCMs Rejected	Applications Accepted	Appl's per 1,000 Demos
2013	987	38	4	42	43
2014	1,321	16	10	26	20
2015	1,366	26	9	35	26
2016	1,599	35	11	46	29
2017	1,749	14	15	29	17
2018	1,841	22	11	33	18
2019	1,665	27	7	34	20
2020	1,198	16	6	22	18
2021	1,326	29	3	32	24
2022	1,551	25	4	29	19
Total	**14,603**	**248**	**80**	**328**	**---**

a) HCM application data provided by the Office of Historic Resources.
b) An HCM application is most often rejected when the CHC determines that the building does not possess enough historic or cultural significance to support designation. While PLUM and the City Council may reject a nomination, they are more likely to approve the nomination but modify or limit the scope of protection.

KEY TAKE-AWAYS:

1. The HCM application acceptance rate for 2013 to 2022 averaged 33 per year with 25 percent being declined or rejected. The total number of applications received and in process is not reported by OHR.
2. Recent years (2019 to 2022) show a reduction in the number of HCMs rejected compared to prior years (17 percent versus 28 percent). An effort to tighten acceptance standards appears to be effective.
3. To protect 1 percent of all buildings in the city via the HCM process will take 323 years at an average designation approval rate of 25 per year.

FIGURE 1 – CITY OF LOS ANGELES
BUILDING DEMOLITIONS VERSUS HCM APPLICATION RATE (2013-2022)



KEY TAKE-AWAYS:

1. A best-fit line to the data demonstrates an inverse relationship. The number of HCM applications filed per 1,000 demolitions declines as the total number of demolitions increases. Weaponization of the HCM program would suggest a direct relationship with applications increasing in response to increasing demolitions.
2. An inverse relationship can be explained by a system that can only process a limited number of applications per year. With the maximum number of applications limited, the rate per 1,000 demolitions declines in response to increasing demolitions.

TABLE 4 - CITY OF LOS ANGELES
HCM DESIGNATIONS BY DECADE

Decade	HCM Designations	HCM Rejections	Designations (Buildings)(a)	Designations (No./Yr.)
1962-1970	70	4	52	6
1971-1980	160	61	133	13
1981-1990	277	134	257	26
1991-2000	181	47	174	17
2001-2010	302	106	277	28
2011-2020	227	91	217	22
2021-2025 (b)	105	17	103	24
Total	1,322	460	**1,213**	**19**

a) Excludes HCM designated landmarks, structures, objects, and sites that do not include buildings.

b) Year ending 30 Apr 2025 with the HCM designation for the William Mellenthin Birdhouse Apartments (HCM #1322) at 5922-5930 Buffalo Ave.

TABLE 5 - CITY OF LOS ANGELES
WHAT ARE THE DRIVERS FOR DESIGNATED HCM'S?

Basis	2018	2019	2020	2021	2022	Total
Owner Support	12	14	9	15	9	59
Historic Interest	2	10	0	4	9	25
Block Threat	8	2	7	9	6	32
Monument	1	1	0	3	0	5
Total	**23**	**27**	**16**	**31**	**24**	**121**
Owner Support	52.2%	51.9%	56.3%	48.4%	37.5%	48.8%
Historic Interest	8.7%	37.0%	0.0%	12.9%	37.5%	20.7%
Block Threat	34.8%	7.4%	43.8%	29.0%	25.0%	26.4%
Monument	4.3%	3.7%	0.0%	9.7%	0.0%	4.1%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

a) The HCM application form requests the preparer to provide a reason as to why they are seeking designation and the position of the building owner, if known. A form that lists threat to building as "none" and owner support as "no, unknown, or not provided," the application is classified as "historic interest." If no threat answer is provided, and owner answer is no, unknown, or not provided, the application is classified as "block threat."
b) Source: Data compiled by author from HCM applications submitted by the CHC to PLUM and City Council for subsequent hearings and a review of the available records when the owner position was not reported or unclear.

KEY TAKE-AWAYS:

1. About 50 percent of all designated HCM's are obtained with building owner support. An additional 21 percent are obtained by a person or organization with an historical interest in the building, and 4 percent of the designations are for monuments or sites.
2. About one in four HCM designations are obtained in direct response to a threat posed by development. This percentage is expected to drop as new rules and regulations seek to prohibit designation for certain types of residential development.

TABLE 6 - CITY OF LOS ANGELES
WHAT IS THE RISK OF THE HCM PROGRAM TO DEVELOPMENT?

Basis	2018	2019	2020	2021	2022	Total
Accepted HCMs (a)	8	2	7	9	6	32
Declined HCMs	11	7	6	3	4	31
Low Estimate (b)	11	4	9	10	7	41
High Estimate (c)	19	9	13	12	10	63
Demolitions	1,841	1,665	1,198	1,326	1,551	7,581
Risk – Low	0.60%	0.24%	0.75%	0.75%	0.45%	0.54%
Risk – High	1.03%	0.54%	1.09%	0.90%	0.64%	0.83%

a) HCM data is from Table 5 with accepted HCM's showing the number of designations for "block threat" only. Profile data for the declined HCMs is not available.
b) The low estimate is based on the accepted HCM's for "block threat" plus 25 percent of declined nominations; assumes the declined profile is similar to the accepted profile.
c) The high estimate is based on the accepted HCM's for "block threat" plus all declined nominations. The assumption of all declined HCM's were filed to block threat is most conservative.

KEY TAKE-AWAYS:

1. In the years 2018 to 2022, less than 1 percent of all building demolition projects in the City of Los Angeles faced opposition via the HCM nomination process. The actual risk was as low as 0.5 percent.
2. While reliance on the HCM program to block the threat of development does occur on a case-by-case basis, there does not appear to be a weaponization of the program to halt or impede city-wide development. Such a claim is unfounded based on the evidence.
3. There is no justification for the State to impose restrictions on CEQA to such an extent that the effect is to silence all affected stakeholders. HCM designation is not a hard limit protection against demolition, but a requirement to allow affected stakeholders the time needed to find an acceptable alternative to demolition.